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FCC SECRETARY Magalie Roman Salas Office of the
Secretary Fed. Communications Commission
1919 "M" Street NW Room 222 Washington DC 20554

FCC MAIL ROOM Docket 98-143

Sep 29 1998
In the matter of 1998 biennial Regulatory
Review Ammendment of Part 97 of the
Amateur Service Rules FCC WT Docket 98-143

I agree with the proposal to eLminate
The Novice & Tech. Plus Licensing, and
Grandfather Thoes who have all ready Passed
the 5 Words Per Min until They Pass
the General Written. (No time limet on
The Grandfathering the 5 Words Per Min).

I feel that C.W. requirements in Today's
World are No longer a Necessary require-
ment in To Day's Communications.
Their for the 20 Words per min. should
be Dropped from The Extra Class
leaving 5 WPM. for all Classer Except
Extra and reduce the requirement
from 20 wpm To 13 wpm. for just Extra
why →

No. of Copies
List ABCDE

C.W. should & will never become a lost art or form of communications. There are 1000's of active hams who like, have, & use CW only.

The 5 words per min gives everyone a chance to taste CW as they enter Ham Radio. Those who like it will soon become 7-10-15-20+ WPM on their own, those who don't, won't use it again.

The code should reflect understandable copy which more reflects the real world of code as they will become to know it.

I am a VE Tester & have seen many-many people get the gest of the copy when it is multi choice and fail because they missed a few words etc.

I agree with both the FCC & the ARRL
(VE certified)
Should Advanced Class Operators be allowed to administer the General Class Code & Theory exams, on elements which they themselves have qualified for. (YES)

The EXTRA class should be Just That "extra." 13 WPM. Code, 5 or 10 more questions on FCC rules & Regulations, particularly Rule 97.119, which many overlook in Round Tables. Extra should continue to enjoy ^{the} extra freq^s they now have, and earned.

I strongly believe that the CW portions of all HF ^{& VHF & UHF} Bands be re-listed as both CW & Phone in each Class, affording greater bandwidth to ALL, as Phone doesn't much hurt CW when CW comes on the Phone Band. This will still allow the Extra Class to ~~still~~ have some freq^s for them selves.

Enforcement:

Now here is an area that needs a complete over haul. Being a Certified OO it is frustrating

We know your local offices are under staffed in almost every area of the country, and that most of your efforts must go to commercial & essential communications like "Aviation" and "Public Safety" but even though amateur radio is basically self policed we need enforcement with teeth or jaws. The government can and often does produce rules, laws, penalty's and alike, but nothing really happens until there is enforcement that works.

I know of two ways reasonable enforcement can be obtained, but they both cost money, but all enforcement costs, and unless money is made available to do this, no enforcement will result. And the show goes on & on.

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① When 3 or more OC's record the same violation on the same call, freq, time & date and have issued a observer advisory notice, and the violations continue, a federal subpoena be issued to that call in a local federal court, to testify as to why they should not loose their license, equipment, be fined and or incarcerated for such activity. Cooperation on their behalf may reduce any or all of the above. (Thus catch one catch almost all.)

② Buy 1 now for a total of 4 ^{later} UN marked motor homes loaded with HF-VHF & higher gear plus directional antennas. Two FCC employed each vehicle. Catch 1 invoke the above and all will come out not to mention as the motor home travels the amount of CB linear & out of band operators it can catch.

I recommended a Motor home over a Van because
① it can be easily hidden almost out in the
open. ② it can hold living quarters for
the operators. ③ it can hold all equipment
needed including a Generator ④ it can
hide in R.V. Camp Grounds un noticed
for Days or Wks. if need be. These
Camp Grounds are all over the country
and near by all City's.

Start with 1 unit first, all fines
& Equipment taken can be used to
Finance the operation (Just like the
Drug people do.) and you will have
no trouble selling taken equipment.
Enforcement is the key & the only
key to compliance. When people are
caught it must be advertised, once the
word gets out & often compliance will
happen more often